

## REMARKS

In response to the above-identified Office Action, Applicant seeks reconsideration in view of the following remarks. Claims 19-28 remain pending. No new matter has been added.

### **I. Claim Rejections – 35 U.S.C. §103**

Claims 19-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 5,898,679 (“Brederveld”) in view of U.S. Pat. No. 5,987,521 (“Arrowood”). This rejection is respectfully traversed.

Neither of the references, taken alone or in combination, disclose a wireless LAN providing functionality in accordance with a wireless communication standard protocol, wherein the wireless communication server “provides the functionality of the wireless communication standard protocol required for maintaining centralized filtering and forwarding of data to be transmitted to the remote units” as recited in claim 19.

The Examiner again argues in a conclusory fashion that Arrowood “teaches that a centralized filtering and forwarding data at the server would have minimized the complexity and cost,” and that “duplication of the functions would not have been necessary in each of the agent nodes.” Applicant respectfully disagrees. As previously mentioned, Arrowood discloses a network system wherein *management* of routing information is centralized at a manager node, not a system where the actual *routing* of a wireless communication protocol is handled by that node. In case the use of the term “maintains” in the independent claim was not clear and was being interpreted by the Examiner as meaning “management,” it has been amended to recite “performs,” making it quite clear that the manager node itself handles filtering and forwarding.

In any event, there is no teaching of “centralized filtering and forwarding” in Arrowood; in fact, the filtering and forwarding is distributed throughout the system in an undesirable manner. Reducing the complexity of network management, as arguably suggested by Arrowood, does not in any way relate to moving certain **data communication** functions from the AP to a central controller.

That is, Arrowood discloses “path tables” or “path status tables” 36 (see, e.g., Fig. 2) that keep track of all possible paths from and to a particular network node, and this table “is established

in each Agent node of the network.” (Col. 2, lines 9-10). Each agent node then sends data packets “along the calculated route from the originating node to the destination node . . . by placing the route in the header of the data packet.” (Col. 4, lines 16-20). This system is *more* complex than the prior art. That is, in Arrowood, not only does each node have to deal with “filtering and forwarding” (in contrast to the centralized filtering and forwarding recited in the present claims), each node has the added complexity of storing *every possible path* from and to itself within the network. (Col. 5, lines 20-23).

Thus, if Brederveld were combined with Arrowood, the resulting system would be an unsatisfactory and complex network where each AP, server, and mobile unit includes a “path status table” and takes care of its own filtering and forwarding functions. This is dramatically different from the “reduction in complexity and cost” suggested by the Office Action.

Moreover, as with Arrowood, Brederveld also *teaches away* from the present invention. In an attempt to provide the selective repeater functionality, Brederveld notes that “one or more relays (or repeaters) may be incorporated into mobile stations, access points, or both.” (col. 4, lines 55-60). That is, not only is Brederveld making the system *more* complex by incorporating additional components and software within multiple mobile stations and/or access points, the reference at no time contemplates that the selectivity associated with the repeater functionality might be centralized at the server or elsewhere (e.g., server 105 in Fig. 1 of Brederveld). Brederveld sacrifices simplicity, cost, and centralization in the interest of improving communication, while the present invention centralizes the hitherto decentralized functionality of a communication standard in order to reduce cost and complexity. Thus, Brederveld would in no way motivate a person skilled in the art to move the filtering and forwarding requirements of an access point to a centralized server. The inventor was clearly proceeding contrary to accepted wisdom. MPEP 2145(X)(D)(3).

Accordingly, Applicants respectfully submit neither Brederveld nor Arrowood, taken alone or in combination, would include each and every element of claim 19 as currently pending, and furthermore that there is no motivation to combine these references. As the remaining claims variously depend from claim 19, such claims are also non-obvious for at least the reasons set forth above. Applicants therefore request that the Section 103 rejections be withdrawn.

## **II. Conclusion**

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or dpote@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,  
Ingrassia, Fisher & Lorenz

Date February 27, 2009

By /DANIEL R. POTE/  
Daniel R. Pote  
Reg. No. 43,011  
(480) 385-5060